

## **FINDING OF NO SIGNIFICANT IMPACT**

### **Brady Hot Springs PoroTomo Project Environmental Assessment DOI-BLM-NV-W010-2015-0038-EA**

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Based on the interdisciplinary analysis conducted in the Brady Hot Springs PoroTomo Project Environmental Assessment (EA) DOI-BLM-NV-W010-2015-0038-EA dated January 2016, and my consideration of the Council of Environmental Quality's criteria for significance (40 CFR 1508.27), both with regard to the context and the intensity of impacts, I have determined that the impacts associated with the Proposed Action are not significant. Therefore, preparation of an Environmental Impact Statement pursuant to Section 102(C) of the National Environmental Policy Act (NEPA) for the Brady Hot Springs PoroTomo Project is not required.

I have determined that the Proposed Action is in conformance with the approved Record of Decision and Resource Management Plan for the Winnemucca District Planning Area (RMP), May 21, 2015, and the Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region, including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, Utah, September 2015. The Proposed Action is consistent with other Federal agency, state, and local plans to the maximum extent consistent with Federal law and Federal Land Policy Management Act provisions.

#### **Context**

The Brady Power Plant began producing electrical energy from geothermal resources in 1982. Since that time, Brady Power Partners has consistently been working to improve performance of the power generation facility and better understand the geothermal resource. To that end, several projects have been undertaken to drill, test, and develop geothermal wells through various technological changes.

In April, 2015, Brady Power Partners submitted a Notice of Intent to Conduct Geothermal Resource Exploration Operations (NOI) for the PoroTomo Project on behalf of academic institutions who are researching the potential benefits of a new geophysical exploration technique. The PoroTomo Project is located in a known geothermal field and it is designed to better understand the geologic resource at Brady Hot Springs, which will ultimately allow for improved management and development of the geothermal resource.

The proposed activities would result in a total of 5.04 acres of new disturbance (3.31 acres on private land and 1.73 acres on public land).

## Intensity

### *1) Impacts that may be both beneficial and adverse.*

The EA considered possible beneficial and adverse impacts of the proposed project. Under the Proposed Action there are not expected to be adverse impacts to any of the affected environments. Ultimately, the project would result in beneficial economic and energy resource effects and continued research and development for PoroTomo geophysical exploration techniques.

### *2) The degree to which the proposed action affects public health or safety.*

The proposed geophysical exploration activities would not cause adverse public health effects.

### *3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.*

The project would not affect park lands, prime farmland, wetlands, wild and scenic rivers or ecologically critical areas. All areas to be disturbed by the Proposed Action have been surveyed and evaluated for historic and/or cultural resources. No National Register eligible properties would be impacted by the Proposed Action.

### *4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

There is no controversy regarding anticipated effects.

### *5) The degree to which the possible effects on the quality of the environment are likely to be highly uncertain or involve unique or unknown risks.*

The PoroTomo survey would combine seismic geophysical techniques with high-resolution fiber optic cable sensors to produce detailed three-dimensional images of the site's geology. While the geothermal industry has limited experience with this specific exploration technique (PoroTomo), the technology being used is not new and would not involve uncertain or unique risks.

### *6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

Implementation of the proposed action would not establish a precedent for future actions with significant effects and does not represent a decision in principle about a future consideration. All future proposed actions will be subject to NEPA evaluation and independent decision making.

### *7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.*

The analysis concluded that the project would not be expected to result in any direct or indirect impacts to Cultural Resources including National Historic Trails. Therefore, a cumulative effects analysis was not required for this project.

8) *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the NRHP or may cause loss or destruction of significant scientific, cultural, or historic resources.*

The Proposed Action, with implementation of the Environmental Protection Measures (EPM), would have no adverse effects to cultural resources eligible to the National Register of Historic Places (NRHP). With the implementation of the EPMs, the Proposed Action would not impact the California Trail in any way and would not impact the integrity or any of the characteristics that qualify the Central Pacific/Southern Pacific Railroad for the National Register of Historic Places. All other cultural resources located within the assessment areas are determined to be not eligible to the NRHP and therefore would not be affected by the Proposed Action.

9) *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under ESA of 1973.*

Based on the United States Fish and Wildlife Service Information for Planning and Conservation Trust Resource Report generated for the project location, there are no threatened or endangered species or critical habitat present. This was also verified in the field with a site visit conducted by a BLM Wildlife Biologist.

10) *Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.*

No threats of violation were identified in the preparation of the EA and any Decision regarding this proposed project would stipulate that the operator must obtain all necessary approvals from other federal, state, and local agencies before proceeding with the proposed action. The BLM would regularly conduct site inspections to ensure compliance with the NOI.

\S\ Steve Sappington

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1/12/16

**Date**